



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SDD
F.#2009R01764

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 10, 2011

Via Federal Express and ECF

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David Stern, Esq.
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Re: United States v. Betim Kaziu
Criminal Docket No. 09-CR-660 (JG)

Dear Sirs,

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, enclosed please find:

certain of the defendant's bank records, including cancelled checks, Bates-numbered 264 to 320;

a travel itinerary in the defendant's name, Bates-numbered 321 to 322;

a flight manifest, listing the defendant, Bates-numbered 323 to 360;

recorded statements of the defendant along with a consular form executed by the defendant, obtained by State Department officials, Bates-numbered 361 to 365; and

password protected CDs containing the defendant's recorded communications from email accounts, Bates-numbered 366 and 367.

We will send you the password to access the CDs by email. In addition, enclosed please find a DVD containing selected video, audio and document files extracted from the defendant's laptop computer, which includes propaganda and instructional material that was produced by al-Qaeda and other

foreign terrorist organizations, Bates-numbered 368. At trial, the government expects to call an expert witness to testify as to the background, origin and significance of selected portions of some or all of this material. The government is aware of and will comply with its obligations pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) regarding notice of the expert's expected testimony.

Also enclosed please find a DVD containing additional files, extracted from the defendant's associate's computer, which similarly includes propaganda and instructional material, Bates-numbered 369. The government is in possession of a larger volume of digital media recovered from data storage devices belonging to the associate, which will be made available for your inspection upon request.

The government hereby designates the enclosed materials as "sensitive discovery materials" within the meaning of the Protective Order Pertaining to Unclassified Information, which was filed with the Court on May 10, 2010 in the above-referenced case. Given the nature of the material, we request that you do not leave copies of the enclosed inside the MCC.

The government will supplement this disclosure as appropriate. Please contact us at your earliest convenience if you have any questions or concerns.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
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cc Clerk of Court (JG) via ECF